

In The Matter Of:
Hodell-Natco Industries, Inc. v.
SAP America, Inc., et al.

Kevin Reidl

Vol. 2

July 31, 2012

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO) Case No. 1:08 CV 2755
INDUSTRIES, INC.,)
Plaintiffs,) Judge: Lesley Wells
vs.) Magistrate Judge:
SAP AMERICA, INC.,) Greg White
et al.,)
Defendants.) Volume II

VIDEOCONFERENCE DEPOSITION OF KEVIN REIDL

DATE: Tuesday, July 31, 2012
TIME: 9:04 a.m.
PLACE: Reminger & Reminger
1400 Midland Building
101 Prospect Avenue, West
Cleveland, Ohio 44115

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1 the testing, whether it's off site or on site.

2 Q. Do you believe that Hodell had
3 any specific role or responsibility with
4 respect to testing before go live?

5 MR. LAMBERT: Objection.

6 THE WITNESS: I believe that in
7 conjunction with LSi, we -- we did have a role
8 of testing the system.

9 BY MR. STAR:

10 Q. What -- what testing did you
11 understand needed to be done before go live?

12 A. Well, there was lots of different
13 testing. I mean, generally speaking, LSi had
14 a lot of testing to do of their -- their
15 product and how the interface worked. There
16 was stress testing, and then there was, you
17 know, testing the system to make sure everyone
18 can do their tasks.

19 Q. Would you agree that at some
20 point the plan was, whether it was Hodell by
21 itself or in connection with LSi, at some
22 point before the go live, there was a -- a
23 plan in place to actually put users on the
24 system as it would look at the time of go
25 live?

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1 A. Yes.

2 Q. What was that plan?

3 A. The plan was to get as many -- as
4 many users as we could on the system to test
5 -- test its capabilities, and its -- I think
6 we called it stress testing.

7 Q. Who came up with that plan?

8 A. I don't recall. It may -- it was
9 probably LSi and us combined.

10 Q. At LSi, was that Marcia Weissman,
11 or was it somebody else that had came up with
12 that plan?

13 A. May have been Marcia, may have
14 been Jon.

15 Q. Jon Woodrum?

16 A. Right.

17 Q. Did you receive any direction
18 from LSi as to how you were supposed to run
19 stress testing?

20 A. I -- I believe they helped us
21 coordinate how that should be done.

22 Q. What was your understanding of
23 what exactly should be done to stress test the
24 system before go live?

25 A. Generally speaking, we would get

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1 users on the system, doing their jobs in the
2 computer system, and simulate and hour or two
3 of using the system.

4 Q. To your recollection, did Hodell
5 ever get all of its users on the system at one
6 time to stress test it before go live?

7 A. Yes, a few times.

8 Q. When did that occur?

9 A. I believe in January -- when did
10 we go live?

11 Q. Testimony has been sometime in
12 the first or early second week of March,
13 sometime around March 8th, I think.

14 A. I ask, because I get confused
15 between the P21 and SAP. Okay. So it would
16 have been January, February and perhaps early
17 March.

18 Q. It's January --

19 A. Of 2007.

20 Q. Okay. So you believe that
21 throughout that period, or three particular
22 dates in January and February or March you did
23 the stress testing?

24 A. I -- I believe throughout that
25 period we did a number of stress tests. I

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1 can't tell you specifically how many.

2 Q. How many users got on the system
3 during the stress tests?

4 A. I can't tell you that. I don't
5 have that data. I know that I repeatedly sent
6 out emails to all users and our general
7 managers, instructing everyone to get on the
8 system for, you know, this set period of time.

9 Q. Do you know if that in fact
10 happened?

11 A. I believe so.

12 Q. What makes you believe that that
13 happened? What is your basis for that?

14 A. Because I believe our general
15 managers were coordinating the stress testing
16 at their facilities and would confirm that
17 they had users on the system.

18 Q. How many facilities did you have
19 at this time in January of 2007?

20 A. I think we had seven.

21 Q. Were employees in all seven
22 facilities supposed to log on to the SAP
23 system to stress test it at the same exact
24 time?

25 A. Yes. We would have scheduled

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1 time periods.

2 Q. What time periods were those?

3 Were those in the morning, before work
4 started, were they in the afternoon?

5 A. That's a very detailed question.

6 I think there was emails that I sent out. If
7 you could produce those, I would be willing to
8 discuss that.

9 Q. When these stress tests happened,
10 were you on the system yourself?

11 A. At times I was. I can't tell you
12 that I was on for every stress testing.

13 Q. Did you set parameters for the
14 types of transactions that people should enter
15 during the stress test periods?

16 A. I believe we -- we told them do
17 your normal job. For instance, what you did
18 the last two hours, repeat the next two hours
19 type of thing.

20 Q. And it's your belief that they
21 actually did that kind of testing, right?

22 A. I believe so.

23 Q. Okay. Marcia Weissman testified
24 to the effect that after the go live happened,
25 she was told by people at Hodell, including

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1 on the project early on. Why did you come to
2 that conclusion?

3 A. Well, let me read this. Based on
4 this message, it says that we thought the
5 project was further along than it was, and I'm
6 just assuming that means at the time of status
7 updates.

8 Q. And those were status updates you
9 received from LSi?

10 A. I believe so, regarding the
11 functionality of -- of the In-Flight product.

12 Q. Did you personally feel that the
13 solution had been sufficiently tested in your
14 environment before you went live?

15 A. In our --

16 Q. MR. LAMBERT: Objection.

17 THE WITNESS: -- environment before it
18 went live? I think so. I think I made it
19 clear to our team that we were going to do
20 stress testing, and I think I also asked LSi
21 to test in our environment as well.

22 BY MR. STAR:

23 Q. And did LSi do that testing in
24 your environment?

25 A. I don't recall.

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1 Q. Who at LSi did you ask to do that
2 testing?

3 A. It would have been Jon Woodrum,
4 I'm pretty sure.

5 Q. Did you ask Jon to, for instance,
6 come on site and run testing?

7 A. No. I think they would have been
8 able to accomplish that from off site.

9 Q. What -- what happened when the
10 solution went live?

11 A. When the solution --

12 MR. LAMBERT: Objection.

13 THE WITNESS: That's --

14 MR. LAMBERT: You want to specify that
15 a little bit?

16 THE WITNESS: -- a broad question. Is
17 there anything specific?

18 BY MR. STAR:

19 Q. What happened when the solution
20 went live?

21 A. Well, we had all the users log
22 in.

23 MR. LAMBERT: Same objection.

24 BY MR. STAR:

25 Q. Okay.